

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SIDNEY LOGWOOD,	)	
	)	
Plaintiff,	)	11 C 4932
	)	
vs.	)	Judge Der-Yeghiayan
	)	
OFFICER RODRIGUEZ #5099, OFFICER CHEN	)	
#13176, OFFICER WILLIAMS #5503, OFFICER	)	Magistrate Judge Gilbert
CLAY #17684, and THE CITY OF CHICAGO,	)	
a Municipal Corporation,	)	JURY DEMANDED
	)	
Defendants.	)	

**PLAINTIFF'S PROPOSED VERDICT FORM**

We, the Jury, find as follows:

**COMPENSATORY DAMAGES:**

On Plaintiff's claim of Excessive Force, we find:

\_\_\_\_\_ For Plaintiff as against Defendant Rodriguez

\_\_\_\_\_ For Plaintiff as against Defendant Chen

\_\_\_\_\_ For Plaintiff as against Defendant Clay

\_\_\_\_\_ For Plaintiff as against Defendant Williams

\_\_\_\_\_ Against Plaintiff as to all Defendants

We award plaintiff compensatory damages in the following amount \$ \_\_\_\_\_

On Plaintiff's claim of False Arrest, we find:

\_\_\_\_\_ For Plaintiff as against Defendant Rodriguez

\_\_\_\_\_ For Plaintiff as against Defendant Chen

\_\_\_\_\_ For Plaintiff as against Defendant Clay

\_\_\_\_\_ For Plaintiff as against Defendant Williams

\_\_\_\_\_ Against Plaintiff as to all Defendants

We award plaintiff compensatory damages in the following amount \$ \_\_\_\_\_

On Plaintiff's claim of Assault, we find:

\_\_\_\_\_ For Plaintiff as against Defendant Rodriguez

\_\_\_\_\_ For Plaintiff as against Defendant Chen

\_\_\_\_\_ For Plaintiff as against Defendant Clay

\_\_\_\_\_ For Plaintiff as against Defendant Williams

\_\_\_\_\_ Against Plaintiff as to all Defendants

We award plaintiff compensatory damages in the following amount \$ \_\_\_\_\_

On Plaintiff's claim of Battery, we find:

\_\_\_\_\_ For Plaintiff as against Defendant Rodriguez

\_\_\_\_\_ For Plaintiff as against Defendant Chen

\_\_\_\_\_ For Plaintiff as against Defendant Clay

\_\_\_\_\_ For Plaintiff as against Defendant Williams

\_\_\_\_\_ Against Plaintiff as to all Defendants

We award plaintiff compensatory damages in the following amount \$ \_\_\_\_\_

On Plaintiff's claim of Malicious Prosecution, we find:

\_\_\_\_\_ For Plaintiff as against Defendant Rodriguez

\_\_\_\_\_ For Plaintiff as against Defendant Chen

\_\_\_\_\_ For Plaintiff as against Defendant Clay

\_\_\_\_\_ For Plaintiff as against Defendant Williams

\_\_\_\_\_ Against Plaintiff as to all Defendants

We award plaintiff compensatory damages in the following amount \$ \_\_\_\_\_

**PUNITIVE DAMAGES:**

We find that the following punitive damages should be assessed

\_\_\_\_\_ Against Defendant Officer Rodriguez

\_\_\_\_\_ Against Defendant Officer Chen

\_\_\_\_\_ Against Defendant Officer Clay

\_\_\_\_\_ Against Defendant Officer Williams

We award plaintiff punitive damages in the following amount \$ \_\_\_\_\_

PLEASE SIGN AND DATE THIS FORM:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_

\_\_\_\_\_

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**Defendants' Objection to Plaintiff's Proposed Verdict Form**

Defendants' verdict form is streamlined and less confusing for the jury. Defendants' form clearly and appropriately has the jury address liability in the first section and then address damages to be awarded, if any, in the next section. Plaintiff's form misleads the jury with regard to an award of compensatory damages under each count – it essentially allows Plaintiff to recover six times for the same incident. Plaintiff's form also does not appropriately instruct the jury regarding punitive damages. Therefore, Defendants request that their proposed verdict form be used at trial.